

Category #28:

The use of petroleum distillate based cleaning products should be limited.

State Response:

Presently, OGS is unaware of a list of cleaning products that do not contain petroleum distillates. The USDA is establishing guidelines for designating items made from naturally derived products that will be afforded Federal procurement preference, as required under section 9002 of the Farm Security and Rural Investment Act (FSRIA) of 2002. The advantages of this program rely on the USDA surveying the marketplace to determine item designation for inclusion on a preferred naturally derived products list. Federal agencies are to request a quantitative analysis comparison verifying the life cycle costs, environmental and health benefits, performance testing, and percentage of naturally based components. The percentage of naturally based components will be determined by the USDA and there is no predetermined percentage of naturally based components. The USDA feels this will encourage competition among manufacturers and guaranteeing the highest possible percentage of naturally based components in products. . When general purpose cleaning items are posted on the USDA's website, OGS will consider identifying the cleaning products that are on the sample list that have also been certified by USDA and posting that information on the list as products containing naturally occurring components per USDA's definition.

Regarding if the distillate meets the human safety profile, the toxicological properties of a chemical are the same whether the chemical comes from petroleum or from a crop. The safety and environmental profile does need to be described and met regardless of source of the chemical. OGS would support a review and revision of the criteria to see if additional safety considerations need to be addressed.

(See also State Response to Category #3 - The Guidelines should require the use of non-toxic (bio-based) cleaning products).

Frequently Asked Public Comment:

Allowance of Petroleum Derived Ingredients, But Not Natural or Naturally Derived Ingredients: (A)
Replenishable Natural (Plant) Sources: (B) Bio-based Products

--The OGS/Green Seal guidelines do not stipulate the use of natural or naturally derived ingredients, and allow for petroleum derived ingredients.

(Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)

--Should be obtained or derived from replenishable natural (plant) sources wherever possible. Should be as concentrated as possible to green the supply chain (Apply to Tier I Products). (Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)

--With reference to products used daily for general cleaning purposes to which children and staff have the most frequent exposure, we advocate the recommendation (or at least, the delineation) of third party certified, bio-based products without added fragrance
(Janet Foley, Director, Occupational Safety and Health, Civil Service Employees Association, CSEA)

--Why not base efforts on Bio-Based products that are available and not dependant on Personal Exposure Levels (PEL) at all? We have used such a protocol for the past three years successfully. Our cleaning

program is effective, fiscally prudent, and exceeds the standards being discussed. (David E. Kincaid, Great Neck School District)

--Have you heard of Forbetr Products located in Deerfield, Illinois? The NY Transit Authority just bought their vinegar cleaner and their products have improved the indoor air quality of my home and the health of my employees. Perhaps NY schools could benefit as well. If interested contact Forbetr at 800-804-5940 and if you don't mind, mention Mary McCleary and Lexington College. (Mary McCleary)

--(1) Although the recent legislation that has been passed to observe "green cleaning" is a step in the right direction, we feel that purchasing cleaning products for the schools in New York State should have the non-toxic ingredients which can be found in "bio-based products". School districts such as Great Neck, Long Island are maintaining clean schools while the students are not being placed at risk for chronic diseases such as asthma, and cancer. (2) National researchers, whom we have been working with, all highly suspect that toxic childhood exposures, at low doses, during the ages of 6-11 years old may place girls at risk of getting breast cancer in their adult years. This age period is a unique time period since breast cells are proliferating at a fast pace and are sensitive to toxic exposures. (3) Since New York State especially has a high rate of breast cancer, we need to do all that we can to reduce the risk where we can. Certainly, since precedents have been set in several school districts which have shown that bio-based products are effective, yet safer for children, we need to make clear in this "green cleaning legislation that only bio-based products be purchased."

(Laura Weinberg, President, Great Neck Breast Cancer Coalition)

--I am strongly in favor of using Bio Based products and NOT using Green-Seal toxic products in our schools. Children need the most protection we can give them!!!

(Jill P. Madenberg, Lake Success, NY)

--I would also like to see some effort to identify the amount of bio-based materials used in the product.

(Professor Stephen Ashkin, President of The Ashkin Group, LLC.)

--We request that approved bio-based general cleaning products, floor care products, disinfectants, dust mop treatments, graffiti removers, metal and wood polishers, and drain cleaners be separately categorized on the OGS product web-site so they can be easily identified by districts and state agencies. There are environmentally sensitive products under all of these categories certified by either Green Seal or Environmental Choice. We propose to use the definition of "bio-based" as set forth in EPA's Final Guidance on Environmentally Preferable Purchasing. That definition is "... a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal and marine) or forestry materials." Green Seal can identify the certified products that fall within that definition. Many districts are interested in trying bio-based products. They should be able to easily recognize them. This does not reflect any judgment on whether bio-based is better than more traditionally formulated products.

(Katherine Kelleher of (NYSUT) NYS United Teachers)

--We urge that wherever possible, bio-based products be identified and separately delineated as such across all product categories. While bio-based composition of any product should in no way be interpreted as a sole qualifying criterion for inclusion as an environmentally sensitive cleaning and maintenance product, it is useful to identify a product as being bio-based as long as it meets all the other qualifying criteria within the procurement guidelines. This identification will be useful for schools that are looking to procure bio-based products.

(Stephen J. Boese, New York State Director, Healthy Schools Network, American Academy of Pediatrics, Dist. II, American Lung Association of NYC, American Lung Association of NYS, The Association of New York City Education Councils, Campaign for Healthy Children, Citizens Environmental Coalition, Citizens

For A Clean Environment, Community Health and Environment Coalition, Environmental Advocates of NY, For a Better Bronx, Grassroots Environmental Education, INFORM, Inc., Learning Disabilities Association of NYS, Learning Disabilities Association WNY, National Resources Defense Council, NEA of New York, New York Committee for Occupational Health and Safety, Toxic Waste Lupus Coalition, WEACTION for Environmental Justice, Wellness in the Schools Inc., Jacquelyn Kamin, Community Affairs Director of Opportunity Charter School, Philip J. Landrigan, MD, MSc, Professor and Chairman of Department of Community & Preventive Medicine Mount Sinai School of Medicine, Connecticut Foundation for Environmentally Safe Schools, Health Schools Campaign, Chicago IL, Healthy Children Organizing Project, San Francisco, Ca., and NEA Healthy Schools Caucus)

--Must not contain petroleum distillates unless no natural alternative is available, and then only if the distillate meets the human safety and environmental profile outlined herein (Apply to Tier I Products). (Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrow's Children, Hackensack, NJ 07601)